

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**ERICSSON INC., AND  
TELEFONAKTIEBOLAGET LM ERICSSON,**

**Plaintiff,**

**v.**

**TCL COMMUNICATION TECHNOLOGY  
HOLDINGS, LTD., TCT MOBILE LIMITED,  
AND TCT MOBILE (US), INC.,**

**Defendant.**

**Civil Action No. 2:15-cv-00011-RSP**

**JURY TRIAL**

**DECLARATION OF WARREN LIPSCHITZ IN SUPPORT OF  
ERICSSON'S OPENING BRIEF REGARDING TCL'S MOTION FOR  
ADDITIONAL CLAIM CONSTRUCTION**

I, Warren Lipschitz, do state and declare as follows:

I am an attorney with the law firm of McKool Smith PC ("McKool Smith"), counsel for Plaintiffs Ericsson Inc. and Telefonaktiebolaget LM Ericsson. I make this declaration in support of Plaintiff's Opening Brief Regarding TCL's Motion for Additional Claim Construction. Unless otherwise stated, the matters contained in this declaration are of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters set forth herein.

1. Attached hereto as Exhibit 1 is a true and correct copy of an excerpt of TCL's Disclosure of Proposed Terms and Claim Elements for Construction, Pursuant to P.R. 4-1, served on May 22, 2015.

2. Attached hereto as Exhibit 2 is a true and correct copy of TCL's Amended Disclosure of Proposed Terms and Claim Elements for Construction, Pursuant to P.R. 4-1, served on June 16, 2015.

3. Attached hereto as Exhibit 3 is a true and correct copy of an excerpt of TCL's Preliminary Claim Constructions Pursuant to P.R. 4-2, served on June 23, 2015.

4. Attached hereto as Exhibit 4 is a true and correct copy of an excerpt of TCL's Preliminary Claim Constructions, Pursuant to P.R. 4-2, served on July 7, 2015.

5. Attached hereto as Exhibit 5 is a true and correct copy of an excerpt of TCL's Petition for Inter Parties Review of U.S. Patent No. 7,149,510.

6. Attached hereto as Exhibit 6 is a true and correct copy of an excerpt of TCL's Claim Construction Brief Regarding Terms of the '510 Patent, filed with the USPTO on March 28, 2016.

7. Attached hereto as Exhibit 7 is a true and correct copy of Ericsson's Proposed Terms and Claim Elements for Construction, Pursuant to P.R. 4-1 (A), served on May 22, 2015.

I declare under penalty of perjury that the foregoing is true and correct and this declaration was executed on May 31, 2017 in Dallas, Texas.

/s/ Warren Lipschitz  
Warren Lipschitz